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22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN FRANCISCO

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 HASTINGS COLLEGE OF THE LAW, a
27 public trust and institution of higher education
28 duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF DARA PAPO IN
SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION TO
ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
Time: 2:00 p.m.
Place: Hon. Jon S. Tigar
Oakland Courthouse
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: Not Set

1 I, DARA PAPO, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I have worked on issues related to public health for over twenty years.

5 3. I currently work for the San Francisco Department of Public Health (“DPH”) where I
6 am the Director of Whole Person Integrated Care, a position I have held since August 2020. Prior to
7 joining DPH I worked for the San Francisco Department of Homeless and Supportive Housing
8 (“HSH”) as a Care Coordination Services Manager beginning in January 2018.

9 4. I am a Licensed Clinical Social Worker and received my Masters in Social Work from
10 the University of California, Berkeley, in 1997.

11 5. As a result of my personal experience, I am familiar with the DPH’s Street Medicine
12 program as well as DPH’s other programs designed to support persons experiencing homelessness.

13 6. The Street Medicine team provides street-based outreach, engagement, and care for
14 unsheltered people experiencing homelessness. The team aims to reduce the number of harmful events
15 this population experiences, such as fatal overdoses and infectious disease, by bringing services to
16 people who otherwise have a hard time accessing healthcare.

17 7. The Street Medicine team recognizes many people experiencing homelessness have had
18 bad experiences with authority figures, including those in the medical system. Part of the goal of the
19 team is to earn our client’s trust by developing relationships. We outreach with partner teams to form a
20 web of support for the most vulnerable of unhoused residents and hold weekly clinics in places like
21 harm reduction sites and drop-in centers. We also link our patients with the Maria X. Martinez Health
22 Resource Center, described below, which has a no appointment model.

23 8. While working with Street Medicine, patients may be linked to substance use treatment
24 services, mental health services, or case management services. People who need extra support to thrive
25 in community may be linked to programs like intensive case management or in-house support services.
26 Once our patients reach a certain level of stability, we support them in graduating from our services to
27 transitional primary care.

1 9. On the ground, the Street Medicine Team can support clients with issues including
 2 urgent care for medical issues like wounds, testing and treatment for STIs, HIV, and COVID,
 3 psychiatric care, overdose follow-up, and low-threshold palliative care for patients with life
 4 threatening conditions who are unable or need support to access traditional palliative care such as
 5 hospice.

6 10. In 2023 alone, the Street Medicine team had over 11,000 encounters with more than
 7 3,000 unique patients. That includes more than 1,500 follow-up visits with more than 600 unique
 8 clients who previously experienced an overdose. The difference between the total number of
 9 encounters and the number of unique patients reflects the Street Medicine team's approach to earning
 10 a patient's trust over time.

11 11. During the same period in 2023, the Street Medicine team provided more than 700
 12 people with referrals to treatment centers, which include medical care, mental health care, residential
 13 treatment, medical detox, and medications for opiate use disorder.

14 12. The Street Medicine team supports the City's goal of reducing the tent count by
 15 offering services to stabilize those in crisis who are currently rejecting shelter. Once a person is in
 16 shelter it is easier for DPH to address their healthcare needs and once a person is receptive to
 17 healthcare services they are often more interested in shelter.

18 13. DPH also supports the Maria X. Martinez Health Resource Center, which I referenced
 19 above. The Center is located at 555 Stevenson Street and had over 20,000 patient visits in 2023. The
 20 Center focuses on serving people experiencing homelessness, many of whom live in the Tenderloin
 21 given the clinic's proximity to the neighborhood. The clinic provides urgent care, addiction medicine,
 22 behavioral health, dental, podiatry, and transitional primary care services.

23 14. DPH also provides on-site health care services to those in shelters and permeant
 24 supportive housing locations, many of which are located in the Tenderloin neighborhood.

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1 15. Based on my experience at DPH and familiarity with the efforts it has taken to reduce
2 homelessness in the Tenderloin and throughout San Francisco, I believe DPH makes every effort given
3 the circumstances to achieve the goal of ensuring that every person who wants to accept shelter or
4 other City-provided services is able to do so.

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6 I declare under penalty of perjury under the laws of the United States and the State of
7 California that the foregoing is true and correct. Executed April 4, 2024 in San Francisco,
8 California.



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10 DARA PAPO
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